

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. SARI EDELMAN,

Plaintiff,

– against –

NYU LANGONE HEALTH SYSTEM, NYU LANGONE
HOSPITALS, NYU LANGONE MEDICAL CENTER, NYU
LANGONE NASSAU RHEUMATOLOGY, NYU SCHOOL
OF MEDICINE, NYU GROSSMAN SCHOOL OF
MEDICINE, NYU HOSPITALS CENTER, ANDREW T.
RUBIN, DAVID KAPLAN, JOSEPH ANTONIK, and
JOSHUA SWIRNOW,

Defendants.

Case No. 1:21-cv-502 (LJL)

**REPLY DECLARATION OF
RICHARD L. STEER IN FURTHER
SUPPORT OF DEFENDANTS’
MOTION FOR JUDGMENT AS A
MATTER OF LAW AND TO
ALTER OR AMEND THE
JUDGMENT**

RICHARD L. STEER, under penalties of perjury, hereby declares pursuant to 28 U.S.C.

§ 1746:

1. I am a Partner at the law firm of Tarter Krinsky & Drogin LLP, attorneys for Defendants NYU Langone Health System, NYU Langone Hospitals, and NYU Grossman School of Medicine, a Division of New York University, f/k/a “NYU Hospitals Center” s/h/a “NYU Langone Medical Center,” “NYU Langone Nassau Rheumatology,” “NYU School of Medicine,” “NYU Grossman School of Medicine,” and “NYU Hospitals Center”, and Andrew T. Rubin, David Kaplan¹, Joseph Antonik, and Joshua Swirnow.

2. A true and correct copy of Plaintiff’s Trial Exhibit 123 is annexed at Exhibit O.

3. A true and correct copy of the July 17, 2023, Court Transcript is annexed at Exhibit P.

4. A true and correct copy of the July 18, 2023, Court Transcript is annexed at Exhibit Q.

¹ At trial, this Court granted judgment as a matter of law dismissing all claims against David Kaplan.

5. A true and correct copy of the July 19, 2023, Court Transcript is annexed at Exhibit R.
6. A true and correct copy of the July 12, 2023, Court Transcript is annexed at Exhibit S.
7. A true and correct copy of the July 11, 2023, Court Transcript is annexed at Exhibit T.
8. A true and correct copy of the Defendants' Trial Exhibit SS is annexed at Exhibit U.
9. A true and correct copy of the Plaintiff's Trial Exhibit 79 is annexed at Exhibit V.
10. A true and correct copy of the July 13, 2023, Court Transcript is annexed at Exhibit W.
11. A true and correct copy of the Defendants' Trial Exhibit QQQ is annexed at Exhibit X.
12. A true and correct copy of the Defendants' Trial Exhibit RRR is annexed at Exhibit Y.
13. A true and correct copy of the Defendants' Trial Exhibit TTT is annexed at Exhibit Z.
14. A true and correct copy of the Defendants' Trial Exhibit VVV is annexed at Exhibit AA.
15. A true and correct copy of Plaintiff's Trial Exhibit 1 is annexed at Exhibit BB.
16. A true and correct copy of the July 14, 2023, Court Transcript is annexed at Exhibit CC.
17. A true and correct copy of Plaintiff's Trial Exhibit 86 is annexed at Exhibit DD.

18. A true and correct copy of Plaintiff's Trial Exhibit 84 is annexed at Exhibit EE.

19. A true and correct copy of the Defendants' Trial Exhibit JJJ is annexed at Exhibit FF.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2023.

/s/ Richard L. Steer

Richard L. Steer